

**TENMILE SOUTH HELENA FOREST RESTORATION COLLABORATIVE COMMITTEE
COMMENTS FOR
TENMILE – SOUTH HELENA PROJECTS
FINAL ENVIRONMENTAL IMPACT STATEMENT**

Prepared for:
Tenmile South Helena Forest Restoration Collaborative Committee

October 11, 2017

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Bill Avey, Forest Supervisor, Helena/Lewis and Clark National Forest
Heather DeGeest, District Ranger, Helena Ranger District
2880 Skyway Drive
Helena, MT 59602

Re: Tenmile South Helena Forest Restoration Collaborative Committee comments on the Tenmile South Helena Project FEIS

Dear Mr. Avey and Ms. DeGeest:

Thank you for the opportunity to submit our objections to the Tenmile/South Helena FEIS and ROD. The Tenmile - South Helena Forest Collaborative (TSH) met twice during the 45-day objection period following the release of the FEIS and ROD for approximately 3 hours each time. A quorum of members was present for both meetings and all objections were passed with full consensus.

You will find eight objections that were carried forward from our comments submitted in December, 2016 in response to Alternative 4 of the DEIS.

The TSH met several times to provide comments to the DEIS and the four alternatives. Our final comments were submitted on December 30, 2016.

The following document contains the objection comments to the Ten Mile - South Helena FEIS and ROD.

Please contact me if you have any questions.

Sincerely,

Joe Cohenour, Chair-TSHC

Cell: 406-431-1144

Tenmile South Helena Forest Restoration Collaborative Committee Members:

In accordance with Section 1 of Helena City Commission Resolution 20106, the Collaborative is made up of 11 individuals:

- Chairman Joe Cohenour, representing conservation organizations
- Co-vice Chair Jordan Alexander, representing the fire community
- Co-vice Chair Mike Bishop, citizen-at-large from the greater Helena area
- Commissioner Cory Kirsch, representing Jefferson County
- Commissioner Susan Good Geise, representing Lewis and Clark County
- Ron Alles, representing City of Helena
- Jeff Chaffee, representing commercial use organizations
- Angie Grove, representing local recreational user organizations
- Gary Marks, representing commercial use organizations
- Doug Powell, citizen-at-large from the greater Helena area
- (Unfilled), representing environmental organizations

Contents

Tenmile South Helena Forest Restoration Collaborative Committee Members:..... 3

Collaborative Comments on FEIS 5

9.1 Fire & Fuel..... 5

9.3 Threaten, Endangered, and Sensitive Wildlife Species 5

9.4 Public Safety 5

9.5 Recreational Use..... 5

9.6 IRAs 5

9.9 Air Quality 5

9.10 Socioeconomic Impacts 6

Collaborative Comments on FEIS

9.1 Fire & Fuel

***2.** The Collaborative suggests that the HNF commence treatments on the periphery of the IRAs or in the private land buffers before beginning on the interior of the IRAs. The Collaborative believes that this will give buffer-adjacent landowners primary protection from direct effects of wildfire.

REMEDY: The Collaborative believes that the HNF needs to establish a timeline or a plan to do the treatments on the periphery of the IRAs or in the private land buffers before beginning on the interior of the IRAs.

9.3 Threaten, Endangered, and Sensitive Wildlife Species

***1.** The Goshawk in Unit 142a on BLM land was not identified and buffered.

REMEDY: The TSH Forest Collaborative requests that the FS and BLM identify and buffer the Goshawk nest in that unit.

9.4 Public Safety

***8.** The Collaborative believes that there is a public safety risk to people with falling beetle killed timber as well as with volunteers attempting to remove dangerous trail obstructions.

REMEDY: Establish a plan or timeline to mitigate the dead timber adjacent to the heavily used recreational trails in the TSH areas.

9.5 Recreational Use

The TSH Collaborative requests that Trail #348 (Switchback Trail) be re-contoured away from the eroded sloped road/trail, to be less direct and more sustainable.

REMEDY: Re-contour the trail.

9.6 IRAs

Collaborative recommends protecting Roadless area values in the project area, especially in the Lazyman IRA that has previously been proposed for wilderness designation.

REMEDY: As such, the Collaborative recommends that the USFS not use heavy, mechanized equipment (skidders, forwarders, etc.) in the Lazyman IRA, with the exception of private land buffers.

9.9 Air Quality

The FEIS partially addressed the Collaborative's December 2016 comments, *but did not bring in a comparison of a larger wildfire event with prescribed fire projected air quality impacts as requested in Comment #4 under Sec. 9.9, Air Quality. This is a missed opportunity to explain to the public the advantages of limiting smoke from managed prescribed fire vs. the*

extended duration extreme air quality impacts of large scale wildfire. The air quality experienced during Summer 2017 is a perfect example of extreme impacts from large and multiple wildfire events.

Use of the 170-acre McDonald Pass fire as the wildfire example for assessing air quality impacts, both in pollutant impacts and duration, is inappropriate. Modeled impacts from this fire do not violate particulate matter air quality standards at any distance from the fire; yet we know from personal experience that impacts from larger fires, both in the vicinity and those at a distance upwind, do violate particulate standards set to protect public health.

REMEDY: The Collaborative suggests looking at impacts of another local fire, the Warm Springs fire in 1988, or the Snow-Talon fire in 2003, or pulling in data from particulate monitoring in the Helena area during summer 2017. Any of these events will more correctly describe the potential air quality impacts from significant wildfire events and demonstrate a more appropriate comparison of air quality impacts from prescribed fire with those from wildfire.

9.10 Socioeconomic Impacts

The Collaborative feels that closures for mitigation on Trails 337, 375, and 348 could impact local tourism and businesses. Without using mechanical treatments, the trail closures could be lengthier.

REMEDY: The Collaborative recommends that the USFS allow mechanical treatments for Trails 337, 375, 348, and Road 1863.

REMEDY: The Collaborative recommends that treatments in these locations be done outside of the July 1 through September 1 season, which is the window of time used by the Trail Rider, Bike Helena, and Helena Tourism Alliance to promote economic tourism in the Helena area.